

PLAINTIFF IS REPRESENTING HIMSELF

Attorney for Plaintiff  
Michael J. Gallagher

BY: Michael J. Gallagher

In re:

DELPHI CORPORATION, et al., Debtors and Debtors-in-Possession, Debtor.

Case No.: Chapter 11 Case No. 05-44481

**Objection to:** NOTICE OF MOTION FOR ORDER UNDER 11 U.S.C. §§105,363(b)(1), AND 1108 CONFIRMING DEBTORS' AUTHORITY TO TERMINATE EMPLOYER-PAID POST-RETIREMENT HEALTH CARE BENEFITS AND EMPLOYER-PAID POST-RETIREMENT LIFE INSURANCE BENEFITS FOR CERTAIN (A) SALARIED EMPLOYEES AND (B) RETIREES AND THEIR SURVIVING SPOUSES

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK  
YOUR HONORABLE JUDGE ROBERT DRAIN, ALLOWING DELPHI AND DEBTORS TO ELIMINATE THE AGREED UPON BENEFIT COVERAGE FOR DELPHI SALARIED EMPLOYEES WILL SET A DANGEROUS PRECEDENCE TO ALL COMPANIES IN THE UNITED STATES ENCOURAGING THEM TO DO LIKEWISE, SETTING OFF A DOMINO AFFECT DEVASTING MANY FAMILIES. THE SALARIED DELPHI RETIREES ARE NOT THE CEO'S OF THE COMPANIES AND PROUDLY MAINTAIN THAT THEY ARE SUPERVISORS MAKING NO MORE, AND SOMETIMES LESS, THAN THE HOURLY EMPLOYEE PROTECTED BY AN UNION. SHORT NOTICE TO TERMINATE RETIREMENT BENEFITS FOR CERTAIN SALARIED RETIREES HAS PUT ADDED BURDEN TO OBTAINING AFFORDABLE REPLACEMENT INSURANCE. ALSO, CHANGES IN PRE-EXISTING HEALTH COVERAGE OPPORTUNITIES MAKE IT DIFFICULT FOR MY SPOUSE AND I TO FIND AFFORDABLE HEALTH CARE. ALSO, IF IT IS AS I'VE HEARD THAT ALL HOURLY DELPHI RETIREES HAVE BEEN TRANSFERRED TO GM ROLES, THEN DELPHI HAS REDUCED THE INSURABLE POOL TO A SUCH A REDUCED SIZE LESSONING SALARIED EMPLOYEES ELIGIBILITY FOR AFFORDABLE RATES. ALSO, BY ASSUMING THAT THE RULING WILL BE IN THEIR FAVOR, DELPHI HAS PREMATURLY SENT OUT NOTICES THAT ALL BENEFITS WILL BE TERMINATED. LACK OF KNOWLEDGE OF PROCEDURE AND AN INADEQUATE AMOUNT OF TIME TO ADDRESS THIS MOTION IS CAUSING DURESS ASSOCIATED WITH APPLICATION PERIODS. ALSO, PREMIUMS BEING OFFERED FOR SELF PAY ARE NOT AFFORDABLE AS THEY ARE NOT ACTUALLY BASED ON EMPLOYER RATES FOR THE SAME COVERAGE. DECISIONS MADE BY SALARIED EMPLOYEES TO RETIRE WERE BASED ON INFORMATION GIVEN TO THEM AT THE TIME OF THE SIGNING OF THE RETIREMENT CONTRACT. DECISIONS BASED ON IMPLIED PROMISES FOR PROVIDING MONTHLY HEALTH AND LIFE INSURANCE PROVISIONS. THEREFORE, I ASK THAT YOU HEAR MY PLEA AS I WITH OTHER DELPHI RETIREES, REQUEST THAT YOU DISMISS THIS REQUEST AND DEMAND DELPHI CREATE ANOTHER PLAN WHERE CUTS CAN BE MADE TO SECURE THE FUTURE OF THE COMPANY. WE ARE AVERAGE CITIZENS WHO HAVE DEDICATED MANY YEARS TO THE COMPANY BELIEVING THAT THERE WAS THIS SECURITY IN OUR RETIREMENT.

RESPECTFULLY,

MICHAEL J. GALLAGHER  
**DELPHI SALARIED RETIREE**  
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